

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**KENNETH FITCH  
ESTATE OF DIANNE L. FITCH**

**VS.**

**Civil Action No. 18-CV-214 JJM-PAS**

**FEDERAL HOUSING FINANCE  
AGENCY,  
FEDERAL NATIONAL  
MORTGAGEASSOCIATION,  
WELLS FARGO BANK, N.A.,  
266 PUTNAM AVENUE, LLC  
RUSHMORE LOAN MANAGEMENT SERVICES, LLC  
US BANK NATIONAL ASSOCIATION AS TRUSTEE  
FOR RMAC TRUST, SERIES 2016-CTT**

**NOTICE TO TAKE DEPOSITION**

**DEPONENT:** FEDERAL HOUSING FINANCE AGENCY

**DATE:** April 26, 2021

**TIME:** 9:30 AM

**NOTICE OF DEPOSITION PURSUANT TO F.R.C.P. 30(b)(6)**

Please take notice that Plaintiff, Kenneth Fitch will take the deposition upon oral examination, of Federal Housing Finance Agency commencing at 9:30 a.m. on Monday April 26, 2021 and from day to day thereafter until completed. Pursuant to the United States District Court for the District of Rhode Island's General Order Regarding Depositions in Civil Cases During Coronavirus Pandemic, issued on May 22, 2020, the deposition will be taken and recorded over remote

videoconferencing before an officer authorized by law to administer oath and record testimony, and also may be recorded by audio, audiovisual, or stenographic means, as provided for by, and in accordance with all applicable law. You are invited to attend by phone and/ or video and cross-examine. The videoconference link and call-in information will be provided in advance of the deposition.

Please reach out to undersigned counsel immediately upon receipt of this Notice if you have any concerns regarding participation by remote video and/or phone conferencing.

Pursuant to RCP (30)(b)(6), Federal Housing Finance Agency (“FHFA”) shall designate one or more person(s) with knowledge to testify on its behalf regarding the following areas of inquiry:

1. The person(s) with knowledge of when FNMA or any other entity, sold Dianne Fitch’s promissory note and mortgage along with the name and business address of the purchaser.

2. The person(s) with knowledge of any purchase and sales agreement or other documents by which FNMA or any other entity sold Dianne Fitch’s promissory note and mortgage.

3. The person(s) with knowledge of whether Federal National Mortgage Association had any ownership of the Dianne Fitch’s mortgage or promissory note on or after July 28, 2017.

4. The person(s) with knowledge of any documents which indicate whether Federal National Mortgage Association had any ownership of Dianne Fitch's mortgage on or after July 28, 2017.

5. The person(s) with knowledge of the actual owner of the Dianne Fitch's Mortgage and note on July 28, 2017 and thereafter and of all the documents on which this knowledge is based.

KENNETH FITCH

DIANNE FITCH

By their Attorney

March 25, 2021

/s/John B. Ennis  
JOHN B. ENNIS, ESQ. #2135  
1200 Reservoir Avenue  
Cranston, Rhode Island 02920  
(401) 943-9230

A subpoena duces tecum with be issued in conjunction with the Deposition.

CERTIFICATE OF SERVICE

I hereby certify that I emailed/mailed/faxed a copy of this Notice of Deposition to all parties which are electronic filers and to the following at their respective email addresses/mailling address on March 25, 2021.

Zachary Berk  
Samuel Bodurtha  
Michael Jusczyk

s/John B. Ennis  
JOHN B. ENNIS, ESQ